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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X	
STANACARD, LLC,	:
	:
Plaintiff,	:
	:
	:
v.	:
	:
	:
REBTEL NETWORKS, AB, and REBTEL	:
MOBILE, INC.,	:
	:
Defendants.	:
----- X	

Civil Action No. 08-cv-4859 (RWS)

ECF CASE

STANACARD'S REPLY TO
REBTEL'S COUNTERCLAIMS

Plaintiff Stanacard, LLC ("Stanacard" or "Plaintiff"), by its attorneys, Winston & Strawn LLP, hereby answers the Counterclaims of defendants Rebtel Networks, AB and Rebtel Mobile, Inc. (collectively "Defendants" or "Counterclaimants") as follows. To the extent not explicitly admitted, all allegations of the Counterclaims are denied.

THE PARTIES

1. Plaintiff admits the allegations contained in paragraph 1 of the Counterclaims
2. Plaintiff admits the allegations contained in paragraph 2 of the Counterclaims.
3. Plaintiff admits the allegations contained in paragraph 3 of the Counterclaims.
4. Plaintiff admits the allegations contained in paragraph 4 of the Counterclaims.

JURISDICTION AND VENUE

5. Plaintiff admits that this action arises under the patent laws of the United States, Title 35 United States Code and that this Court has jurisdiction under 28 U.S.C. §§ 1331 and 1338(a). Plaintiff also admits that venue is proper under 28 U.S.C. §§ 1391(c) and 1400(b). Plaintiff denies the remaining allegations contained in paragraph 5 of the Counterclaims.

6. Plaintiff admits the allegation contained in paragraph 6 of the Counterclaims, but denies that there is any basis for the relief that Defendants seek in their Counterclaims.

REPLY TO THE FIRST COUNTERCLAIM **(Declaratory Judgment of Noninfringement)**

7. Plaintiff repeats its responses to the allegations of paragraphs 1 through 6 of the Counterclaims as if set forth fully herein.

8. Plaintiff admits that Defendants purport to seek a declaration of non infringement, but denies that Defendants have any basis for such a declaration. Plaintiff denies any remaining allegations contained in paragraph 8 of the Counterclaims.

REPLY TO THE SECOND COUNTERCLAIM
(Declaratory Judgment of Invalidity Under 35 U.S.C. § 102, 103, and/or 112)

9. Plaintiff repeats its responses to the allegations of paragraphs 1 through 8 of the Counterclaims as if set forth fully herein.

10. Plaintiff admits that Defendants purport to seek a declaration of invalidity, but denies that Defendants have any basis for such a declaration. Plaintiff denies any remaining allegations contained in paragraph 10 of the Counterclaims.

DEMAND FOR JURY TRIAL

Plaintiff hereby requests a trial by jury on all of the claims and issues raised by Defendants' Counterclaims

WHEREFORE, Plaintiff respectfully request the Court enter an order:

- A. That Defendants/Counterclaimants take nothing by way of their Counterclaims;
- B. Entering judgment dismissing Counterclaimants' claims in their entirety with prejudice;
- C. Awarding Plaintiff the costs of defending against the Counterclaims, including reasonable attorneys' fees;
- D. That Plaintiff be granted the relief requested in the Complaint; and
- D. For such other relief as the Court deems to be just and equitable.

Dated: New York, New York
September 4, 2008

WINSTON & STRAWN LLP

By: /s/
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